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January 6, 2022

Via ECF

The Honorable James M. Wicks
U.S. Magistrate Judge
U.S. District Court, Eastern District of New York
100 Federal Plaza
Central Islip, New York 11722

Re: Joint Letter Motion to Adjourn Status Conference and Oral Argument
Case: AA Medical, P.C. v. Khaled Almansoori, M.D.
Case No.: 20-cv-03852 (DG)(JMW)

Dear Judge Wicks,

This law firm represents plaintiff AA Medical, P.C. ("Plaintiff") in the above-referenced case. Pursuant to Rule 1(D) of Your Honor's Individual Practice Rules, we respectfully request that the Court: (1) adjourn the telephonic status conference scheduled for January 10, 2022 at 11:30 a.m. until a later date to be determined by the Court; and (2) adjourn oral argument on Defendant's motion to stay discovery [DE 36] which is scheduled for January 27, 2022 at 12:00 p.m. until February 10, 11, 17, or 18, 2022, or such other later date to be determined by the Court. My office conferred with Defendant's counsel, Adam Kleinberg, Esq., who joins in this request.

The parties request that the January 10th status conference be adjourned to conserve judicial resources and limit the expenditure of legal fees due to Defendant's pending motions to stay discovery [DE 36] and dismiss [DE 44] and the upcoming oral argument with respect to the motion to stay discovery. This is the parties' first request to adjourn the January 10th status conference.

The parties also request that the January 27th oral argument be adjourned based on Defendant's counsel's representations to my office that Defendant's counsel is scheduled to be on trial beginning on January 24, 2022 in a separate, unrelated case pending before U.S. District Court Judge Gary R. Brown, and that such trial is expected to last 1-2 weeks. This is the parties' second request to adjourn oral argument on Defendant's motion to stay discovery. By order dated November 19, 2021, the Court granted the parties' first request to adjourn oral argument to permit Plaintiff to obtain new counsel and replace The Law Office of David A. Antwork, P.C. as its prior counsel [DE 50].

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We thank the Court for its time and consideration.

Respectfully submitted,

FORCHELLI DEEGAN TERRANA LLP

By: /s/ Gregory S. Lisi
Gregory S. Lisi, Esq.

cc: All counsel (via ECF)